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April 22, 2011

Via ECF and Facsimile to (973) 645-4412

The Honorable Michael A. Shipp, U.S.M.J.
The United States District Court for the District of New Jersey
Martin Luther King, Jr. Federal Building & United States Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: Reyes v. Keith Machinery Corp., et al.
Civil Action No.: 2:09-CV-5309
Our File No.: 348-1033

Dear Judge Shipp:

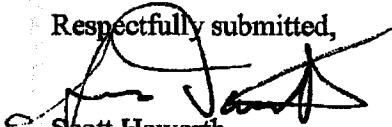
This firm represents defendant Keith Machinery Corp. ("KMC") in the above-referenced matter. We are writing to respectfully request, on consent of all parties, a brief, two-week extension of the deadline to serve rebuttal expert reports and remaining discovery deadlines. This request is based upon the fact that our expert is unexpectedly unavailable for the next few weeks, which is beyond the control of KMC.

In particular, we request that the deadlines be extended as follows:

- All rebuttal reports shall be produced by May 17, 2011;
- All expert depositions shall be completed by June 13, 2011;
- The final pretrial conference shall be held on July 19, 2011 at 1:00 pm; and

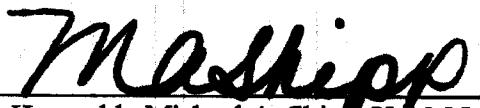
The joint proposed final pretrial order shall be submitted to the Court by July 12, 2011.

Respectfully submitted,


Scott Haworth
Haworth Coleman & Gerstman, LLC

The Honorable Michael A. Shipp, U.S.M.J.
April 22, 2011
Page 2

So Ordered:



The Honorable Michael A. Shipp, U.S.M.J.
Dated: April 25, 2011

Cc:

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